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March 4, 2014

Hon. Paul Crotty
United States District Court
United States Courthouse
500 Pearl Street
New York, NY 10007

Wesam El-Hanafi v. United States of America et al., 13-CV-2072 (PAC)

Your Honor:

We represent defendant Conmed Healthcare Management, Inc. ("Conmed") in this matter.

The court will recall that, plaintiff, who is currently awaiting sentencing before the Honorable Kimba A. Wood in the matter of *United States v. Wesam El-Hanafi*, 10-Cr-162 (KAW) as a result of his conviction under 18 U.S.C. 2339B for "Providing Material Support or Resources to a Foreign Terrorist Organization" and under 18 U.S.C. 371 for "Conspiracy to Provide Material Support or Resources to a Foreign Terrorist Organization", brought the instant action alleging that, following his arrest in Dubai, UAE on April 27, 2010 and subsequent transport to the United States on April 30, 2010, he developed a deep vein thrombosis (DVT). Plaintiff alleges that Conmed, its agents and employees, which operated the medical facility at the City of Alexandria Jail, failed to provide adequate medical care to plaintiff during his brief, initial confinement to that facility in 2010.

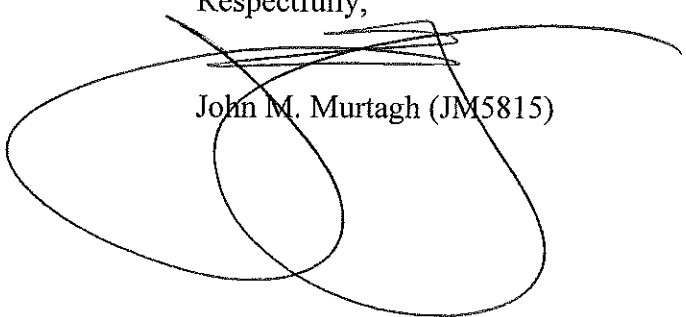
At the conference on February 14, 2014, the court granted defendants leave to file motions to dismiss, directing that defendants file such motions by March 14.

I am the sole attorney in this firm familiar with this case. Subsequent to the February 19 conference, it was confirmed that I am to appear for trial in an unrelated matter, *Bektic-Marrero v. Goldberg et al.*, 11-Cv-1781(CM)(AJP), on March 12, 2014. That date was confirmed as a firm trial date on February 28. Based upon the anticipated schedule, it is realistic to assume that trial will last until, at least, the end of March. I have been engaged full time since February 28 in preparing for that trial and anticipate that I will be so engaged at least until month's end.

Additionally, plaintiff filed a third amended complaint on February 19, 2014 which adds Correct Care Solutions, LLC ("CCS") as a defendant. To our knowledge CCS has not been served at this time. However, we anticipate that, when served, CCS may request that this firm appear and represent its interests. We also anticipate that some or all of the grounds for dismissal as to Conmed will apply to the claims against CCS.

It is requested, therefore, that due to my engagement in the *Bektic-Marrero* matter as well as the economy of a possible single motion, that the time to move to dismiss be extended thirty days until April 14, 2014.

Respectfully,



John M. Murtagh (JM5815)

cc: Jake Harper, Esq.
Michael J. Byars, Esq.